

Jonathan A. Rich (NV Bar #15312)
COZEN O'CONNOR
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Phone: (702) 470-2324
Fax: (702) 470-2359
Email: jarich@cozen.com

*Attorney for Defendant
Perry Johnson & Associates, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RATIEK LOWERY, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

PERRY JOHNSON & ASSOCIATES, INC.

and

NORTHWELL HEALTH, INC.,

Defendants.

CASE NO.: 2:23-cv-01857

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF RATIEK LOWERY'S
COMPLAINT**

FIRST REQUEST

Plaintiff Ratiek Lowery, individually and on behalf of all others similarly situated, ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiff filed the Complaint on November 13, 2023 and served Northwell on November 16, 2023 and PJ&A on November 15, 2023, respectively.

On December 8, 2023, Plaintiff filed a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings Pursuant to 28 U.S.C. § 1407 (the "Motion") in the Judicial Panel on Multidistrict Litigation

1 (“JPML”). *See In re Perry Johnson & Associates Medical Transcription Data Security Breach*
2 *Litigation*, Case MDL No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the
3 potential consolidation and transfer of at least forty-five related putative class action complaints.
4 The JPML heard oral arguments on the Motion on January 25, 2024.

5 Defendants’ individual responses are currently due by January 29, 2024.

6 This extension is necessary to allow the JPML sufficient time to evaluate the various related
7 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
8 included as Appendix A. As nearly every party—including Plaintiff and Defendants—has agreed
9 that centralization is proper, the primary question for the JPML is *where* to centralize the cases, not
10 *whether* to centralize them.

11 Plaintiff and the Defendants consent to this request. This is the first request for extension of
12 time for this deadline. The parties respectfully submit that there is good cause for this extension
13 and the requested extension is not for the purpose of delay.

14 ///

15 ///

16 IT IS SO STIPULATED.

Dated: January 26, 2024.

SNELL & WILMER LLP

By: /s/ Alex L. Fugazzi

Alex L. Fugazzi (NV Bar #9022)
Aleem A. Dhalla (NV Bar #14188)
3883 Howard Hughes Parkway, Ste 1100
Las Vegas, NV 89169-5958
Telephone: (702) 784-5200
afugazzi@swlaw.com
Adhalla@swlaw.com

William L. Roberts*
Kathryn E. Caldwell*
Andrew B. Cashmore*
ROPES & GRAY LLP
Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-3600
Phone: (617) 951-7000
Fax: (617) 951-7050
william.roberts@ropesgray.com
kathryn.caldwell@ropesgray.com
andrew.cashmore@ropesgray.com

Glen J. Dalakian II*
ROPES & GRAY LLP
1211 Avenue of the Americas
New York, New York 10036-8704
Phone: (212) 596-9000
Fax: (212) 596-9090
glen.dalakian@ropesgray.com

*Counsel for Defendant Northwell
Health, Inc.
pro hac vice forthcoming

Dated: January 26, 2024.

STRANCH, JENNINGS & GARVEY,
PLLC

By: Nathan R. Ring

Nathan R. Ring (NV Bar #12078)
3100 W. Charleston Blvd, Suite 208
Las Vegas, NV 89102
Phone: (725) 235-9750
lasvegas@stranchlaw.com
nring@stranchlaw.com

Ben Barnow (*Pro Hac Vice*)
Anthony L. Parkhill (*Pro Hac Vice*)
BARNOW AND ASSOCIATES, P.C.
205 W. Randolph St., Suite 1630
Chicago, Illinois 60606
Phone: (312) 621-2000
b.barnow@barnowlaw.com
aparkhill@barnowlaw.com

Counsel for Plaintiff and Putative Class

Dated: January 26, 2024.

COZEN O'CONNOR

By: /s/ Jonathan A. Rich

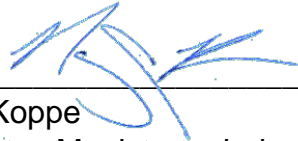
Jonathan A. Rich (NV Bar #15312)
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
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Fax: (702) 470-2359
jarich@cozen.com

*Counsel for Defendant Perry Johnson &
Associates, Inc.*

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Parties' stipulation is GRANTED. Defendants shall have up to and including **March 1, 2024** to respond to Plaintiff's complaint.

IT IS SO ORDERED.



Nancy J. Koppe
United States Magistrate Judge

Dated: January 29, 2024